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REDACTED, FOR PUBLIC INSPECTION

**ORIGINAL**

**EX PARTE OR LATE FILED**

February 22, 2018

**ACCEPTED/FILED**

**VIA ELECTRONIC FILING AND HAND-DELIVERY**

**FEB 22 2018**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

**RE: Request for Confidential Treatment**  
**Notice of *Ex Parte* Presentation: CG Docket Nos. 10-51 and 03-123**

Dear Ms. Dortch,

ZVRS Holding Company, parent company of CSDVRS, LLC d/b/a ZVRS ("ZVRS") and Purple Communications, Inc. ("Purple") herein submits the attached *ex parte* letter in the above-captioned proceedings.

Pursuant to 47 C.F.R. §§ 0.457, 0.459, ZVRS and Purple request that the Commission provide confidential treatment for the company-specific, highly-sensitive and proprietary commercial information in the attached letter and withhold that information from public inspection. The confidential information constitutes highly-sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS and Purple hereby state as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

ZVRS and Purple request confidential treatment of the corporate proprietary information on ZVRS and Purple between the notations "[\*\*\*BEGIN CONFIDENTIAL INFORMATION\*\*\*]" and "[\*\*\*END CONFIDENTIAL INFORMATION\*\*\*]" in the attached letter.

**2. Identification of the circumstance giving rise to the submission.**

ZVRS and Purple are submitting this information with respect to their Petition for Limited Waiver and Extension of the TRS-URD Implementation Deadline filed in the above-referenced dockets on February 15, 2018.

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in the attached letter is highly-sensitive commercial information specific to the operations and strategies of ZVRS and Purple. This information is generally safeguarded from competitors and is not made available to the public.

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**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information involves VRS, a nationwide competitive service.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the information included in the letter could cause substantial competitive harm to ZVRS and Purple, because it would provide competitors insight into ZVRS's and Purple's confidential operational and strategy information, which would work to ZVRS's and Purple's severe competitive disadvantage.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

ZVRS and Purple routinely treat the information provided in the following letter as highly confidential and exercise significant care to ensure that such information is not disclosed to competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

ZVRS and Purple do not make the data provided in the attached letter available to the public, and this information has not been previously disclosed to third parties, except where required by the Commission and the TRS Fund Administrator, each of whom protect the confidentiality of such submissions.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

ZVRS and Purple request that the information identified in the following letter be treated as being confidential on an indefinite basis, as they cannot identify a date certain on which this information could be disclosed without causing competitive harm to ZVRS and Purple.

Respectfully submitted,

/s/ Gregory Hlibok

Gregory Hlibok

Chief Legal Officer and Chief Compliance  
Officer

ZVRS Holding Company, parent company of  
CSDVRS, LLC d/b/a ZVRS and Purple  
Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765

Enclosures

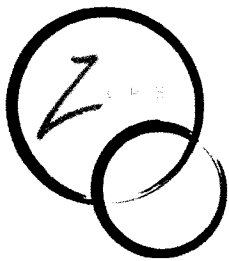
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cc:

Karen Peltz Strauss

Eliot Greenwald

Bob Aldrich



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Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation: CG Docket Nos. 10-51 and 03-123**

Dear Ms. Dortch,

On February 22, 2018, Gregory Hlibok, Chief Legal Officer for ZVRS Holding Company ("ZVRS Holding"), parent company of CSDVRS, LLC, d/b/a ZVRS ("ZVRS") and Purple Communications, Inc. ("Purple") (together, the "Companies"), along with their outside counsel Jennifer Richter, met via teleconference with Karen Peltz Strauss and Eliot Greenwald of the Consumer and Governmental Affairs Bureau. Mr. Hlibok explained the Companies ongoing efforts to collect customer registration data and to submit that data to the Telecommunications Relay Service User Registration Database ("TRS-URD"). Mr. Hlibok identified the following key factors as a basis for granting the Companies' petition for limited waiver and extension of the February 28, 2018 deadline for TRS-URD submission for at least ninety (90) days.<sup>1</sup>

**[\*\*\*BEGIN CONFIDENTIAL INFORMATION \*\*\*]**

- [REDACTED]
- [REDACTED]
- [REDACTED]

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<sup>1</sup> CSDVRS, LLC d/b/a ZVRS and Purple Communications, Inc., Petition for Limited Waiver and Extension of the TRS-URD Implementation Deadline, CG Docket Nos. 10-51 & 03-123 (filed Feb. 15, 2018).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

\*\*\*END CONFIDENTIAL INFORMATION \*\*\*

Respectfully submitted,

/s/

Gregory Hlibok  
Chief Legal Officer  
ZVRS Holding Company  
595 Menlo Drive  
Rocklin, CA 95765

cc: Karen Peltz Strauss  
Eliot Greenwald  
Robert Aldrich